

MARIANNE C. LANUTI, SBN 007784
Law Offices of Marianne C. Lanuti
194 Inveraray Court
Henderson, NV 89074
Tel: 702.501-1147
Fax: 702.270-2346
Nvkidslaw@gmail.com

TODD BOLEY, CA Bar No. 68119
Law Offices of Todd Boley
2831 Mariner Square Dr., Ste 280
Alameda, CA 94501
Tel: (510) 836-4500
Fax: (510) 649-5170
(admitted *Pro Hac Vice*)

PETER W. ALFERT, CA Bar No. 83139
LAW OFFICE PETER ALFERT, P.C.
909 Marina Village Pkwy., 199
Alameda, California 94501
Tel: (925) 279-3009
Fax: (925) 279-3342
(admitted *Pro Hac Vice*)

Attorneys for Plaintiffs

MARK E. FERRARIO, SBN 1625
KARA B. HENDRICKS, SBN 7743
WHITNEY L. WELCH, SBN 12129
GREENBERG TRAUIG, LLP
10845 Griffith Peak Drive, Suite 600
Las Vegas, Nevada 89135
Tel: (702) 938-6856
Fax: (702) 792-9002
ferrariom@gtlaw.com
hendricksk@gtlaw.com
welchw@gtlaw.com

*Attorneys for Defendants Clark County
School District,
Shawn Paquette and Kristy Keller*

TREVOR J. HATFIELD, SBN 7373
HATFIELD & ASSOCIATES, LTD
703 S. 8th Street
Las Vegas, NV 89101
Tel: (702) 388-4469
Fax: (702) 386-9825
THatfield@HatfieldLawAssociates.com

Attorneys for Defendant James P. Doran

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

BROOK M. HURD, GERALDINE C. HURD,
AND M.H., A MINOR, BY AND THROUGH
HER GUARDIAN AD LITEM, BROOK M.
HURD; LUIS O. VILLALOBOS; OLIVIA N.
ESPINOZA; AND L.M.V., A MINOR, BY AND
THROUGH HIS GUARDIAN AD LITEM
OLIVIA N. ESPINOZA;

Plaintiffs,

v.

CLARK COUNTY SCHOOL DISTRICT,
JAMES P. DORAN, SHAWN PAQUETTE,
AND KRISTY KELLER

Defendants.

Case No. 2:16-cv-02011-GMN-NJK

**STIPULATION EXTENDING DEADLINE
FOR PLAINTIFFS TO FILE MOTION
FOR ATTORNEYS FEES AND COSTS**

[SECOND REQUEST]

1 IT IS HEREBY STIPULATED by and between the parties to the above-entitled action
2 that:

3 Plaintiffs, BROOK M. HURD, GERALDINE C. HURD, and M.H., a minor, by and through
4 her guardian ad litem, BROOK M. HURD; LUIS O. VILLALOBOS; OLIVIA N. ESPINOZA;
5 L.M.V., a minor, by and through his guardian ad litem, OLIVIA N. ESPINOZA; ZEKROLLAH
6 SANAEL, ELHAM EGH DAMIAN; and S.S., a minor, by and through his guardian ad litem,
7 ZEKROLLAH SANAEL, and Defendant, Clark County School District (“CCSD”) (collectively, the
8 “Parties”), by and through its undersigned counsel of record, hereby stipulate and agree as follows:

9 IT IS HEREBY STIPULATED by and between the parties to the above-entitled action as
10 follows:

11 1. The parties reached an agreement to settle the above matter at a settlement
12 conference on November 8, 2018.

13 2. On November 14, 2018, the Court issued a Minute Order setting forth the terms
14 of that agreement. The agreement provides that the plaintiffs shall file a petition for
15 compromise of the minors’ claims within 30 days of the School Board’s approval of the
16 proposed settlement. In addition, Plaintiffs are to file an application for attorneys’ fees and
17 costs within 30 days of the Board’s approval of the settlement.

18 3. At the January 16, 2019 status conference the parties indicated that the CCSD
19 Board was expected to consider the settlement on January 24, 2019.

20 4. Due to unforeseen circumstances, the CCSD Board did not consider the
21 proposed settlement until its meeting on February 14, 2019.

22 5. On January 28, 2019, the Court entered a stipulated order extending the deadline
23 for Plaintiffs’ to file a Motion for Attorneys’ Fees and Costs to thirty days after the anticipated
24 board action on February 14, 2019.

25 6. The current deadline for Plaintiffs to file their Motion for Attorneys’ Fees and
26 Costs is March 15, 2019.

27 7. The parties hereby stipulate to a two-week extension of this deadline making the
28

new deadline for Plaintiffs to file their Motion for Attorneys' Fees and Costs March 29, 2019.

<p>DATED this 1st day of March, 2019.</p> <p>GREENBERG TRAURIG, LLP</p> <p><u>/s/ Kara B. Hendricks</u></p> <p>MARK E. FERRARIO, ESQ. Nevada Bar No. 1625 KARA B. HENDRICKS, ESQ. Nevada Bar No. 7743 WHITNEY L. WELCH-KIRMSE, ESQ. Nevada Bar No. 12129 10845 Griffith Peak Dr., #600 Las Vegas, NV 89135</p> <p><i>Attorneys for Defendants Clark County School District and Shawn Paquette</i></p>	<p>DATED this 1st day of March, 2019.</p> <p>LAW OFFICES OF PETER ALFERT, PC</p> <p><u>/s/ Peter W. Alfert</u></p> <p>PETER W. ALFERT, ESQ. <i>Admitted Pro Hac Vice</i> IAN A. HANSEN, ESQ. <i>Admitted Pro Hac Vice</i> 909 Marina Village Parkway, #199 Alameda, CA 94501</p> <p>MARIANNE C. LANUTI, ESQ. Nevada Bar No. 7784 LAW OFFICES OF MARIANNE C. LANUTI 194 Inveraray Court Henderson, NV 89074</p> <p>TODD BOLEY, ESQ. <i>Admitted Pro Hac Vice</i> LAW OFFICES OF TODD BOLEY 2831 Mariner Square Drive, Suite 280 Alameda, CA 94501</p> <p><i>Attorneys for Plaintiffs</i></p>
<p>DATED this 1st day of March, 2019.</p> <p>HATFIELD & ASSOCIATES</p> <p><u>/s/ Trevor J. Hatfield</u></p> <p>TREVOR J. HATFIELD, ESQ. Nevada Bar No. 4373 KARA B. HENDRICKS, ESQ. <i>Attorneys for Defendant James Doran</i></p>	

ORDER

The deadline for Plaintiffs to File a Motion for Attorneys' Fees and Costs is extended two weeks to March 29, 2019.

IT IS SO ORDERED:

Dated: March 14, 2019


UNITED STATES MAGISTRATE JUDGE